## SECTION J

SOLID WASTE MANAGEMENT UNITS (SWMUs), HAZARDOUS
WASTE MANAGEMENT UNITS (HWMUs), AND AREAS OF
CONCERN (AOCs)

Siemens Water Technologies Corp. Siemens Industry, Inc. 2523 Mutahar Street Parker, Arizona 85344

> February 2007 April 2012 Revision 91

Siemens Water Technologies Corp. Siemens Industry, Inc. – Parker, AZ RCRA Permit Application

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# SOLID WASTE MANAGEMENT UNITS, HAZARDOUS WASTE MANAGEMT UNITS, AND AREAS OF CONCERN

This section identifies each of the known solid waste management units (SWMUs), hazardous waste management units (HWMUs) and Areas of Concern (AOCs) at the facility and provides the information required by 270.14(d)(1) and (2). The EPA has initiated a RCRA Facility Assessment (RFA), however as of the time of submittal of this Part B Permit Application, that assessment is on-going, and no results are available. Therefore, all information is provided based on facility knowledge of the past and current operations, and draft information received from EPA.

The following definitions are found in EPA regulations, guidance, and preambles to RCRA rulemaking notices.

- A "Solid Waste Management Unit" is "[a]ny discernible unit at which solidwastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released." [61 Fed. Reg. 19,432, 19,442-19,443 (May 1, 1996); accord EPA, Call Center Questions and Answers (Mar. 1, 2004)]. Examples of SWMUs include container storage areas, tanks, surface impoundment, waste piles, land treatment units, landfills, incinerators, underground injection wells and other physical, chemical and biological treatment units, stormwater retention ponds containing contaminated sediments, industrial sewers designed to collect wastes, wood preservative kickback areas.
- A Hazardous Waste Management Unit is a "contiguous area of land on or inwhich hazardous waste is placed, or the largest area in which there is significant likelihood of mixing hazardous waste constituents in the same area." [40 C.F.R. § 260.10.] Examples of HWMUs include "a surface impoundment, a waste pile, a land treatment area, a landfill cell, an incinerator, a tank and its associated piping and underlying containment system and a container storage area." [/d].
- An Area of Concern is "any area of a facility under the control or ownership
  of an owner or operator where a release to the environment of hazardous
  wastes or hazardous constituents has occurred, is suspected to have
  occurred, or may occur, regardless of the frequency or duration." [63 Fed.

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Reg. 56710, 56715, n.1 (Oct. 22, 1998).] Areas of concern include areas that have experienced one-time spills of hazardous waste or hazardous constituents that have not been adequately cleaned up. [61 Fed. Reg. 19,432, 19,443 (May 1, 1996).]

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## J.1 Characterization of the Solid Waste Management Units

The facility has identified three operating areas <u>and one past operating area</u> on the facility containing <del>solid waste management units and one past operating area containing solid waste management units at the facility as required by 270.14(d)(1)SWMUs, HWMUs, and AOCs.</del> The areas containing <del>solid waste management</del>these units are:

- 1) The container storage area,
- 2) The storage tank <u>and unloading</u> area, consisting of tanks T-1, T-2, T-5, T-6, and T-18, and the Hopper H-1,
- The carbon reactivation furnace and associated emission control equipment (RF-2), and
- 4) The inactive carbon reactivation furnace and associated emission control equipment (RF-1) as well as T-8.

Within these areas, a list of SWMUs, <u>HWMUs</u>, <u>and AOCs</u> has been compiled for inclusion with this Part B Permit Application. Tables J-1, <u>J-2 and J-3</u> lists the identified SWMUs, <u>HWMUs</u>, <u>and AOCs</u>, <u>respectively</u>. <u>The SWMU and HWMU tables and provides the following information for each identified SWMUunit</u>. <u>Following completion of the Facility Assessment, the following information pertaining to these solid waste management units will be assembled:</u>

- 1) The designation of each type of unit (name, description);
- 2) The general dimensions and structural description of each unit:
- 3) The date each unit was first operated; and
- Specification of all wastes that have been managed in each unit, to the extent available.

The location of each solid waste management unitSWMU, HWMU, and AOC is shown on a series of drawings designated as Figures J-1 through J-3.7.

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#### J.2 Releases

Any leaks, drips, or spills from any of the solid waste management units identified in Section J-1, above, are routinely cleaned up as soon as practical and the area decontaminated to remove any hazardous wastes or hazardous waste constituents. The facility has experienced four reportable releases of hazardous wastes or hazardous waste constituents from the solid waste management units, as follows:

Nov 10, 1994 – Facility Lift Station Overflow – Reported to NRC, CRIT, LEPC – overflow caused by a power outage.

April 17, 1995 - Facility Lift Station Overflow - Reported to NRC, CRIT, LEPC - overflow caused by power outage.

February 15, 1996 - Facility discharge line was accidentally cut by Southwest Gas contractor relocating natural gas line - Reported to NRC, CRIT, LEPC.

September 26, 1998 – Spill of recycle water from a trailer outside the facility gate - Reported to NRC, CRIT, LEPC.

For each release, a complete investigation and report has been compiled and is kept at the facility. The following information, at a minimum, is recorded for any release from a solid waste management unit identified in Section J.1 above:

- 1) Date, type, quantity, and nature of any release;
- 2) Groundwater monitoring and other analytical data;
- 3) Physical evidence of stressed vegetation;
- 4) Historical evidence of any releases;
- 5) Any state, federal, or local enforcement action to address releases;
- 6) Any public citizen complaints that indicate a release; and
- 7) Any other information showing the migration of a release.

Because these spills have been cleaned up, the spill areas are not included as AOCs, in accordance with the definitions provided above.

TABLE J-1. SOLID WASTE MANAGEMENT UNIT IDENTIFICATION

No.	SWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit		
1	Bermed containment in process areaSpent carbon reactivation furnace—RF 1 and Associated Equipment (Dewater screw, Weigh Belt)	<u>Fast of</u> <u>Warehouse</u> South of RF-2	Approx 180' x 55'; concrete14'-2" H 9'-3" OD Four hearths	<u>August</u> <u>1992</u> <del>August</del> <del>1992</del>	Spent activated carbon. See Part A Application for list of applicable waste codes	None		Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial
2	Sump by H-1 Spent carbon reactivation furnace RF-2 and Associated Equipment (Dewater Screw, Weigh Belt)	South of H-1 East of warehouse	3'-4" square; <u>concrete</u> See Appendix X	July 1996 July 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None		Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial
3	Sump by storage tank, T-9 Spent carbon unloading hopper H1	East of warehouse in between T-9 and RF-2North end of facility on containment	3'-4" square sump; Udrain 30' long x 16"wide; concrete5000 lb capacity; mild steel	August 1992 to present duly 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None		Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial
4	Recycled motive water storage tank, T–9Spent carbon unloading hopper H2	East of warehouse on containmentInside warehouse facing east wall	10,500 gal 316 series stainless steel500 lb capacity; mild steel	1996 to presentAugust 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None		Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial

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TABLE J-1. SOLID WASTE MANAGEMENT UNIT IDENTIFICATION

No.	SWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit	
5	Rainwater and motive water storage tank, T-12Spent carbon slurry and recycle water transfer system	<u>Fast of</u> <u>warehouse on</u> <u>containment</u> <del>East</del> <u>of the warehouse</u> <u>on containment</u>	25,080 gal Mild steel4" pipes hopper to tank; 3" pipes T-tank to furnace feed tank; 300 series SS	August 1992. Removed from service in 2002.	Spent activated carbon. See Part A Application for list of applicable waste codes	None	 Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial
6	Wastewater storage tank, T-11 SystemSpent carbon storage warehouse	East of the warehouse and south of RF - 2Inside warehouse	10' Dia x 20' H; Approx 12,000 gal fiberglass Approx 80' x 80' concrete/metal	August	Spent activated carbon. See Part A Application for list of applicable waste codes	None	Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: No Spacing
7	Sump by cooling screw under Venturi scrubber tankSpent carbon unloading area	East of warehouse beside RF-2North area of facility	3'-4" square; concrete Approx 44" x 152" concrete	July 1996 to present August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None	Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial
8	RF-2 scrubber water equalization tank, T- 19Spent carbon slurry storage tank, T-1, T-2, T-5, T-6 and Ancillary Equipment	Under RF-2 Structure East of warehouse on containment	Approx. 1000 gal Fiberglass See Appendix IX	July 1996 to presentAugust 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None	Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial
9	Hazardous waste debris binT-8 and Ancillary Equipment	North of warehouse on containment by H-1RF-1 Structure	20 - 40 cubic yards Mild steel 905 gal 300- series SS	August 1992 to presentAugust 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None	Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial Formatted: Font: (Default) Arial

TABLE J-1. SOLID WASTE MANAGEMENT UNIT IDENTIFICATION

No.	SWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit			
10	Spent carbon storage warehouse grated trenches and sump T-18 and Ancillary Equipment	Warehouse in containment areaRF-2 structure	Trench 3 ft, 4 in square  sump U-drain 50 ft long, 16 in wide; cross drain sections 40 ft long 16 in wide Concrete5000 gal 300- series SS	1992 to present-duly 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None		For	rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial
11	Hopper containment pad Recycled motive water storage tank, T 9	Outside H-1 structureEast of warehouse on containment	Approx 60' x 44': concrete 10,500 gal 300-series SS	July 1996 August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None		For	rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial
12	WWTP Wastewater storage tank, T-11 System	Inside warehouse East of the warehouse and south of RF -2	Fiberglass, mild steel modular water treatment system. Separate containment.10' Dia x 20' H; Approx 12,000 gal fiberglass	October 2003 to present August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None		For	rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial
13	Wastewater lift station and piping system (old)RF-2 scrubber water equalization tank, T-19	At the end of access road to plant. Old piping from Tank T-11 to the Lift Station Under RF-2 Structure	Approx. height 15 ft; outside diameter 5 ft Lift Station: mild steel/concrete/fiberglass Old piping system PVC.Approx 1000 gal fiberglass	1992 to 1996July 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None	+	For For	rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: Font: (Default) Arial rmatted: No Spacing

TABLE J-1. SOLID WASTE MANAGEMENT UNIT IDENTIFICATION

No.	SWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
14	Spent carbon unloading/transfer area containment padHazardous waste debris bin	North area of facilityNorth of warehouse on containment by H- 1	Approx. 44 ft by 80	August 1992 to present August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<del>15</del>	Spent carbon storage warehouse grated trenches and sump	Warehouse in containment area	Trench 3'-4" square; U-drain 50' L x 16" W; Cross drains 40' x 16"; concrete	August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<del>16</del>	Bermed containment in process area	East of Warehouse	Approx 180' x 55'; concrete	August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None
17	Sump by H-1	South of H-1	3'-4" square; concrete	July 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None
18	Sump by storage tank, T—9	East-of warehouse in between T-9 and RF-2	3'-4" square; U-drain 30' x 16"; concrete	August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None

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TABLE J-1. SOLID WASTE MANAGEMENT UNIT IDENTIFICATION

No.	SWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
<del>19</del>	Sump by cooling screw under Venturi scrubber tank	East of warehouse beside RF-2	3'-4" square; concrete	<del>July 1996</del>	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<del>20</del>	Wastewater conveyance piping to wastewater treatment tank	East of RF-2 structure	3" PVC piping	August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<del>21</del>	Wastewater lift station and piping system (old)	At the end of access road to plant. Old piping from Tank T-11 to the Lift Station	Approx 15' H x 5" Dia; mild steel, SS, and fiberglass. Ductile iron Piping	August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	Section J.2
<del>22</del>	New Facility Discharge Piping System	New piping bypasses Lift Station to POTW	3" PVC	February 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	See Section J.2
<del>23</del>	<del>Carbon adsorber -</del> <del>PV1000</del>	North of Containment Pad for Storage Tanks	1000 lb carbon capacity; mild steel. New canisters substituted.	August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None

## TABLE J-1. SOLID WASTE MANAGEMENT UNIT IDENTIFICATION

No.	SWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
<del>2</del> 4	Hopper containment pad	Outside H-1 structure	Approx 60' x 44'; concrete	<del>July 1996</del>	Spent activated earbon. See Part A Application for list of applicable waste codes	None
25	WWTP	Inside warehouse	Fiberglass, mild steel modular water treatment system. Separate containment.	October 2003	Spent activated carbon. See Part A Application for list of applicable waste codes	None

No.	HWMU Type/Designation	<b>Location</b>	<u>General</u>	Date Unit	<b>Identification of</b>	Releases
			<b>Dimensions and</b>	was First	Wastes Managed	from Unit
			Structural	Operated	in Unit	
			Description			

No.	HWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
1	Spent carbon reactivation furnace - RF-1 and Associated Equipment (Dewater screw)	South of RF-2	Furnace shell – carbon steel; internal firebrick lining and block insulation; hearths and furnace roof constructed with firebrick; furnace roof is comprised of firebrick backed with block insulation and castable insulation; bottom hearth is insulated with block insulation and castable insulation and castable insulation	August 1992; Shut down in 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None

No.	HWMU Type/Designation	<u>Location</u>	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
2	Spent carbon reactivation furnace RF-2 and Associated Equipment (Dewater Screw, Weigh Belt)	East of warehouse	Furnace shell – carbon steel; internally lined with firebrick and block insulation; hearths and furnace roof constructed with firebrick; furnace roof is comprised of firebrick backed with block insulation and castable insulation; bottom hearth is insulated with block insulation and castable insulation; continuously seal welded internally to assure an air- tight assembly. Dewatering screw length 17 ft; diameter 8 in.	July 1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
3	3 RF-1 Air pollution control e	equipment				

No.	HWMU Type/Designation	<u>Location</u>	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
	Afterburner	RF-1 structure	Refractory lined steel	1992 to 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None
	<u>Venturi scrubber</u>	RF-1 structure	Hastelloy C	1992 to 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None
	Packed bed scrubber	RF-1 structure	Fiberglass	1992 to 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None
	Emissions stack	RF-1 structure	Mild steel	1992 to 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None
4	RF-2 Air pollution control equ	uipment	•			
	Afterburner	RF-2 structure	Refractory lined steel cylinder chamber	1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None

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No.	HWMU Type/Designation	<u>Location</u>	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
	Venturi scrubber	RF-2 structure	Hastelloy C	1996 to present	Spent activated	<u>None</u>
	Packed bed scrubber	RF-2 structure	Fiberglass	1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
	Wet electrostatic precipitator	RF-2 structure	Fiberglass/AL6XN	1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
	Induced draft fan	RF-2 structure	300-series SS	1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
	Emissions stack	RF-2 structure	Fiberglass surrounded by a mild steel shell	1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None

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No.	HWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
<u>5</u>	Spent carbon unloading hopper H-1	North end of facility on containment	5000 lb capacity; mild steel	1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<u>6</u>	Spent carbon unloading hopper H-2	Inside warehouse facing east wall	500 lb capacity; mild steel	August 1992 to present	Spent activated	<u>None</u>
<u>7</u>	Hopper air pollution control equipment piping and baghouse	North end of facility on containment	Ducting, baghouse and fan are mild steel	1992 to present	Spent activated  carbon. See Part A  Application for list of applicable waste codes	None 
<u>8</u>	Spent carbon slurry and recycle water transfer system	Inside warehouse on containment	4" pipes hopper to tank; 3" pipes T-tank to furnace feed tank; 300- series SS	1992 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
9]	Spent carbon storage warehouse	Inside warehouse	80 ft by 80 ft concrete/ metal	1992 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None

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No.	HWMU Type/Designation	<u>Location</u>	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
<u>10</u>	Spent carbon slurry storage tank, T–1	<u>Fast of</u> <u>warehouse within</u> <u>containment</u>	8319 gal design capacity	Used tank (1956); 1992 to present	Spent activated	None
11	Spent carbon slurry storage tank, T-2	East of warehouse within containment	8319 gal design capacity	Used tank (1956); 1992 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<u>12</u>	Spent carbon slurry storage tank, T–5	East of warehouse within containment	8319 gal design capacity	Used tank (1956); 1992 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<u>13</u>	Spent carbon slurry storage tank, T–6	East of warehouse within containment	8319 gal design capacity	Used tank (1956); 1992 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
14	Furnace Feed System Tank T-8 and Ancillary Equipment	RF-1 Structure	905 gal 300 series SS	August 1992 to 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None

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No.	HWMU Type/Designation	<u>Location</u>	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
<u>15</u>	T-18 and Ancillary Equipment	RF-2 structure	6500 gal 300- series SS	July 1996 to present	Spent activated	None
<u>16</u>	Wastewater conveyance piping to wastewater treatment tank	<u>East of RF-2</u> <u>structure</u>	3" PVC piping	<u>August</u> <u>1992</u>	Spent activated	None
<u>17</u>	Spent carbon storage warehouse barrel washer	Next to H-2 in warehouse	2 ft by 3 ft 300 series stainless steel	1992 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<u>18</u>	Carbon adsorber - PV1000	North of Containment Pad for Storage Tanks	1000 lb carbon capacity; mild steel.	August 1992	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<u>19</u>	Carbon adsorber WS-1	Beside spent carbon storage tank	2 x 2000 lb carbon capacity. Mild steel	1992 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	None

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No.	HWMU Type/Designation	Location	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
<u>20</u>	Carbon adsorber WS-2	Beside H-1	5000 lb carbon capacity Fiberglass	1992 to present	Spent activated	None
<u>21</u>	Carbon adsorber WS-3	Beside RF-2	1000 lb carbon capacity Mild steel	1996 to present	Spent activated carbon. See Part A Application for list of applicable waste codes	See Section J.2
<u>22</u>	Slurry transfer inclined plate settler tank	Adjacent to the venturi scrubber	Mild steel	1992 to 1994	Spent activated carbon. See Part A Application for list of applicable waste codes	See Section J.2
<u>23</u>	Scrubber recycle tank T-17	Beside RF-1	Mild steel	1992 to 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None
<u>24</u>	Filter press	Next to scrubber system for RF-1	Mild steel with polypropylene plates	1992 to 1994	Spent activated carbon. See Part A Application for list of applicable waste codes	None

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No.	HWMU Type/Designation	<u>Location</u>	General Dimensions and Structural Description	Date Unit was First Operated	Identification of Wastes Managed in Unit	Releases from Unit
<u>25</u>	New Facility Discharge Piping System	New piping bypasses Lift Station to POTW	<u>6" PVC</u>	February 1996	Spent activated carbon. See Part A Application for list of applicable waste codes	None

## **TABLE J-3. AREA OF CONCERN IDENTIFICATION**

No.	AOC Type/Designation/Location	Management Requirements at Closure
1	Spent carbon unloading and transfer area.	Sampling. See Closure Plan Tank Area and Unloading Area Sample Locations 5 & 7.
2	Tank area concrete containment pad	Sampling. See Closure Plan Tank Area and Unloading Area Sample Location 3.
<u>3</u>	Receiving area/pad	Sampling. See Closure Plan Tank Area and Unloading Area Sample Location 8.
<u>4</u>	Hopper H-1 loading/unloading area	Sampling. See Closure Plan Tank Area and Unloading Area Sample Locations 4 & 5.
<u>5</u>	Hopper H-2 loading/unloading area	Sampling. See Closure Plan Container Area Sample Locations 1 & 2.
<u>6</u>	Spent carbon storage warehouse	Sampling. See Closure Plan Container Area Sample Locations 1, 2, & 3.
<u>7</u>	Furnace feed systems	Sampling. See Closure Plan RF-1 and RF-2 Process Area Sample Locations 1 & 2
8	Recycled motive water tank T-9	Sampling. See Closure Plan Tank Area and Unloading Area Sample Location 6.

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## **TABLE J-3. AREA OF CONCERN IDENTIFICATION**

No.	AOC Type/Designation/Location	Management Requirements at Closure
<u>9</u>	Rainwater, dewatering screw, and motive water tank T-12	Sampling. See Closure Plan Tank Area and Unloading Area Sample Location 2.
<u>10</u>	Spent carbon storage warehouse barrel washer	Sampling. See Closure Plan Container Area Sample Locations 1, 2, & 3.
<u>11</u>	Bermed containment area in process area	Sampling. See Closure Plan RF-1 and RF-2 Process Area Sample Locations 1, 2, & 3.
<u>12</u>	Sump by unloading hopper H-1	Sampling. See Closure Plan Tank Area and Unloading Area Sample Location 4.
<u>13</u>	Sump by tank T-9	Sampling. See Closure Plan Tank Area and Unloading Area Sample Location 6.
<u>14</u>	Spent carbon storage tanks and carbon adsorbers	Sampling. See Closure Plan Tank Area and Unloading Area Sample Locations 1, 2, & 3.

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